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February 2, 2022

VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **United States v. Hayes, et al., 20 Cr. 500 (JGK)**

Dear Judge Koeltl:

Defendants Arthur Hayes, Benjamin Delo, and Samuel Reed write to propose the following schedule regarding expert witness disclosures and related briefing: (i) simultaneous exchange of expert disclosures by February 11, 2022; (ii) simultaneous motions to exclude experts by February 26, 2022; and (iii) simultaneous oppositions to any motions to exclude by March 7, 2022. The government consents to this schedule.

Respectfully submitted,

/s/ Douglas K. Yatter
Douglas K. Yatter
Benjamin Naftalis
of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)

SO ORDERED.

HON. JOHN G. KOELTL
UNITED STATES DISTRICT JUDGE